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Attorneys for Defendant/Counter Claimant  
ALAMEDA UNIFIED SCHOOL DISTRICT

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

LINDA PEDRAZA and FRANCISCO  
PEDRAZA, individually and on behalf of their  
son M.P.,

Plaintiffs,

v.

ALAMEDA UNIFIED SCHOOL DISTRICT,  
et al.,

Defendants.

**Case No.: C05-04977 (VRW)**

**MOTION FOR ADMINISTRATIVE  
RELIEF FOR EXTENSION OF TIME TO  
FILE SUMMARY JUDGMENT MOTION  
ON DAMAGES; [~~PROPOSED~~] ORDER**

(Local Rule 7-11)

AND ALL RELATED COUNTERCLAIMS

AND CONSOLIDATED CASES

Pursuant to Local Rule 7-11, Counter Claimant ALAMEDA UNIFIED SCHOOL DISTRICT hereby moves this Court for administrative relief for an extension of time to file its motion for summary judgment on damages related to its Counter Complaint. Pursuant to the Court's order dated October 20, 2011, the District had one month, or until November 20, 2011, to file its motion for summary judgment as to damages. By this motion and for good cause

1 shown below, the District requests a 10 day extension, until November 30, 2011, to file its  
2 motion for summary judgment.

3 Good cause exists for this extension on the grounds that counsel for the District's time  
4 and attention was unexpectedly required on other cases. The District's counsel, who is the only  
5 one at the firm with knowledge of the issues in this matter, had to draft two unexpected  
6 emergency writ petitions in two different state cases. These two petitions took counsel's  
7 undivided attention for the past three weeks. Therefore, counsel has not had time to review and  
8 analyze the evidence and issues regarding the District's motion for summary judgment as to  
9 damages. The evidence and witnesses regarding the District's motion date back to 2003. Many  
10 witnesses have moved or changed jobs and have been difficult to locate. These witnesses are  
11 necessary to determine which of the various costs the District incurred due to the Counter  
12 Defendants' breach of the settlement agreement at issue. The additional 10 days requested are  
13 necessary to insure that a proper motion for summary judgment is brought before the Court.

14 Therefore, the District request that the Court grant it a ten (10) day extension of time to  
15 file its motion for summary judgment as to damages on its counter claims.

16  
17 Respectfully submitted,

18  
19 Dated: September 5, 2008

**STUBBS & LEONE**

/s/ Katherine A. Alberts

KATHERINE A. ALBERTS, ESQ.

Attorneys for Defendant and Counter Claimant  
ALAMEDA UNIFIED SCHOOL DISTRICT,

**[PROPOSED] ORDER**

Defendant and Counter Claimant ALAMEDA UNIFIED SCHOOL DISTRICT moved pursuant to Local Rule 7-11 for administrative relief. The Court having considered the matter hereby GRANTS the motion and orders as follows:

Defendant and Counter-Claimant ALAMEDA UNIFIED SCHOOL DISTRICT is hereby granted a 10 day extension of time in which to file its motion for summary judgment as to damages on its counter claims. Therefore, the motion for summary judgment is now due on November 30, 2011.

IT IS SO ORDERED.

Date: 11/15/2011

  
Hon. Claudia Wilken  
United States District Chief Judge